

Received

JUL 25 2011

Office of PAGR

RECEIVED

2011 JUL 26 P 9:04



19 July 2011

Highland Industrial Park, Inc.

POSTAL REGULATORY
COMMISSION
OFFICE OF THE SECRETARY

Postal Regulatory Commission
901 New York Avenue NW
Suite 200
Washington, DC 20268-0001

A2011-30

Postal Regulatory Commission,

Please consider this as a formal appeal to the Final Determination to close the East Camden Branch Post Office – Docket Number 1438579-71701.

I would like to start by addressing some factual errors in the document provided;

- 1) The Camden Post Office is seven miles from the East Camden branch not four miles;
- 2) East Camden is a separate community from Camden with its own mayor, city council etc... and is not "administered politically" by the City of Camden as stated in the Final Determination Document.
- 3) Police protection is not provided by the City of Camden, as stated.
- 4) Fire protection is not provided by the City of Camden, as stated.

All of these services are provided by East Camden, which is a separate community from Camden.

While this incorrect information may seem trivial to the decision making process, the correct information was presented to U.S. Post Office personnel, in an April 26th conference call, that included U.S. Senator John Boozman and his staff and, again, in a face to face meeting with U.S. Post Office personnel at Highland Industrial Park in East Camden on May 11th. Now, over two months later, the incorrect information relative to the political and operational status of East Camden is still included in the Final Determination Document.

If this information was relative to the process, then the decision should be reevaluated using the correct information.

Issue #2 is the calculation of cost savings related to this closure. The cost elements considered in the evaluation were as follows:

- 1) Labor and fringe benefits;
- 2) Annual lease costs; and
- 3) Annual cost of replacement service.

1) Labor and fringe benefits – In heading III on page 4 of the Final Determination Document it states; "Any employee assigned to this facility will be relocated with the Postal Service". If all employees are going to be reassigned, what is the basis for approximately \$90,000 in labor related cost savings?

2) Annual Lease Costs – Your current lease on the East Camden facility expires April 30, 2015. There will be no cost savings relative to this lease until the expiration of the current lease agreement, almost four years from now. This savings is shown as \$9,420 annually in the Final Determination Document.

3) Annual Costs of Replacement Service is calculated as \$0. This shows a lack of understanding of this area, the current level of service and the customer base for the East Camden facility. The response to Concern #5 states "Services provided at the Post Office will be available from the Carrier and Customers will not have to travel to another post office for service."

Currently there is no carrier service in this area that services Highland Industrial Park and all of the industrial tenants contained within the complex. Highland encompasses over 18,000 acres and is home to many large businesses, including the major U.S. DOD Contractors on the attached listing. The idea that rural carrier service can be provided in that size of an area to large volume customers at no cost is not realistic.


The rural / contract carrier issue is also shown as item #1 in the list of "advantages" of this proposal. I would like to see a review of the cost of enacting this proposal, that explains how the carrier activity is going to be carried out at no cost. That review should also consider how rural carrier service is going to be provided at all to the larger volume, non-residential customers that are currently the box holders at the East Camden location. The types of vehicles currently used for rural delivery in South Arkansas will not be sufficient for this task.

It is understood that the U.S. Post Office has cost concerns and a need to make some hard decisions relative to postal facilities. This analysis, however, is significantly flawed in its analysis of cost savings and shows a total lack of understanding of the customer base for this facility.

It is my hope that an objective and thorough evaluation will be done before enacting a decision that will not save money, but will cost more to implement than continuing to operate the current site.

Sincerely,

HIGHLAND INDUSTRIAL PARK, INC.



Gene Hill
President

GH:jg

Highland Industrial Park, Inc.

Gene Hill

Post Office Box 3108
East Camden, Arkansas 71711-1208
Phone: 870-574-0010
Fax: 870-574-1828

Aerojet-General Corporation

Post Office Box 1036
Camden, Arkansas 71711-1036
Phone: 870-574-0610
Fax: 870-574-3528
Product: MLRS/ATACMS

American Rheinmetall Defence

Post Office Box 3295
East Camden, Arkansas 71711
Phone: 870-574-2444
Fax: 870-574-
Product: Ammunition & Ordnance Products & Services

Armtec Defense Products

Post Office Box 3297
East Camden, Arkansas 71711-1397
Phone: 870-574-1712 - ext. 113
Fax: 870-574-2540
Product: Pyrotechnic

Arquest, Inc.

Post Office Box 3107
East Camden, Arkansas 71711-1207
Phone: 870-574-1420
Fax: 571-574-2279
Product: Disposable Diapers

Austin Powder Company

Post Office Box 3500
East Camden, Arkansas 71711-1600
Phone: 870-574-0580
Fax: 870-574-2060
Product: Explosives

CSI Construction

Post Office Box 3129
East Camden, Arkansas 71711-1229
Phone: 870-574-0330
Fax: 870-574-2677
Product: General Commercial Construction

Day & Zimmermann, Inc.

Post Office Box 3199
East Camden, Arkansas 71711-1299
Phone: 870-574-2556
Fax: 870-574-2975
Service: Subcontractor

East Camden & Highland Railroad

Post Office Box 3180
East Camden, Arkansas 71711-1280
Phone: 870-574-0770
Fax: 870-574-2637
Service: Short Line Railroad

Lockheed Martin Missiles & Fire Control

Post Office Box 1015
Camden, Arkansas 71711-1015
Phone: 870-574-0200 Ext. 4111
Fax: 870-574-4016
Product: PAC-3, HIMARS, MLRS Rockets & THAAD

National Technical Systems

Post Office Box 3315
East Camden, Arkansas 71711-1415
Phone: 870-574-0031
Fax: 870-574-0037
Service: National Ordnance & Munition
Environmental Test Center

R&R Trucking Company, Inc.

Post Office Box 3072

East Camden, Arkansas 71711-1172

Phone: 870-574-0470

Product: Freight Terminal, Safe Haven

Raytheon Missile Systems Company

Post Office Box 3394

East Camden, Arkansas 71711-1494

Phone: 870-574-5469

Fax: 870-574-0512

Product: Explosive Ordnance/Std. Msl.

SAU Tech / ALETA

Post Office Box 3499

East Camden, Arkansas 71711

Phone: 870-574-4500 / 870-574-1521

Fax: 870-574-4520

Spectra Technologies LLC

Post Office Box 3355

East Camden, Arkansas 71711

Phone: 870-574-2555 / 870-574-2559

Fax: 870-574-2560

Product: Ammunition & Ordnance Products &
Services